
BOSTON GAS COMPANY, COLONIAL GAS COMPANY,
AND ESSEX GAS COMPANY D/B/A/ KEYSpan ENERGY DELIVERY

D.T.E. 04-9

THIRD SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY TO
BOSTON GAS COMPANY, COLONIAL GAS COMPANY,
AND ESSEX GAS COMPANY D/B/A/ KEYSpan ENERGY DELIVERY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Boston Gas Company, Colonial Gas Company, and Essex Gas Company, d/b/a/ Keyspan Energy Delivery New England (“Keyspan” or “Company”) the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and

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basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and with all parties; also submit one (1) copies of the responses to John J. Geary, Hearing Officer, one (1) copy of the responses to Andreas Thanos, Assistant Director, Gas Division; one (1) copy of the responses to Alexander Kofitse, Analyst, Gas Division; one (1) copy of the responses to Marilyn Ross, Analyst, Gas Division; and one (1) copy of the responses to Kenneth Dell Orto, Analyst, Gas Division.
8. All non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.
9. Responses are due by the close of business (5:00 p.m.) Friday, May 21, 2004.

INFORMATION REQUESTS

- DTE 3-1 Refer to the Company’s filing at 9. Please explain why Keyspan has proposed to treat the revenues received from the portfolio-management contract consistent with the directives in Interruptible Transportation, D.P.U. 93-141-A (1995), instead of Boston Gas Company/Colonial Gas Company/Essex Gas Company, D.T.E. 99-76, at 23, n.15 (1999).